Weaponized Legal Authority and Institutional Complicity: A Constitutional and Ethical Analysis of the Retaliatory Injunction Filed by Judge Charlene Jackson Against Erin Gerlach in Arizona Family Court

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Abstract

This case study analyzes the March 2025 restraining order filed by Maricopa County Superior Court Judge Charlene Jackson against litigant Erin Gerlach. The injunction is examined as a paradigmatic example of judicial retaliation and the weaponization of legal authority to suppress constitutionally protected speech. Drawing from court filings, sworn affidavits, and documented communications, this analysis demonstrates that the injunction was not a legitimate protective measure but a calculated abuse of judicial power. The findings reveal a disturbing pattern of constitutional violations and institutional complicity, highlighting systemic failures in judicial oversight and accountability.

Keywords: Judicial Misconduct, Constitutional Violations, First Amendment Retaliation, Due Process, Judicial Accountability, Judicial Bias, Weaponization of Legal Authority, Institutional Complicity, Family Court Reform, Judge Charlene Jackson, Erin Gerlach, Joint Legislative Committee on Family Court Orders, Judicial Retaliation, Civil Harassment Injunction, Family Court Failure, Family Court Crisis, Family Court Corruption, Judicial Ethics, Recusal Obligations, Judicial Ethics, Unlawful Surveillance, Judicial Stalking, Conflict of Interest, Civil Liberties Suppression, Abuse of Process, Public Trust in Judiciary, Anti-SLAPP, Arizona Family Court, Maricopa County Superior Court

I. Introduction

The intersection of judicial authority and constitutional rights presents one of the most critical challenges in maintaining democratic governance and the rule of law. When judges—entrusted with the sacred duty of impartial adjudication—weaponize their authority to silence critics and suppress dissent, the very foundations of justice are threatened. The case of Judge Charlene Jackson's restraining order against Erin Gerlach represents a stark illustration of this phenomenon, revealing how legal mechanisms designed to protect citizens can be perverted into instruments of retaliation and oppression.

This comprehensive analysis examines the March 24, 2025, Injunction Against Harassment filed by Judge Charlene Jackson of the Maricopa County Superior Court against litigant Erin Gerlach, analyzing it as a paradigmatic example of judicial retaliation and the weaponization of legal authority to suppress constitutionally protected speech. Through comprehensive examination of court filings, sworn affidavits, public records, and documented communications, this research demonstrates that Jackson's injunction represents not a legitimate protective measure, but a calculated abuse of judicial power designed to silence a whistleblower who exposed systematic misconduct within Arizona's family court system. The analysis reveals a disturbing pattern of perjury, constitutional

violations, and institutional complicity that extends beyond individual misconduct to encompass systemic failures in judicial oversight and accountability mechanisms. The evidence presented demonstrates that Jackson's restraining order constitutes a fraudulent legal instrument predicated on demonstrable falsehoods, strategic timing designed to inflict maximum harm, and a transparent attempt to criminalize constitutionally protected speech.

The ramifications of this case extend well beyond the immediate parties and speak to a broader institutional crisis within Arizona's judicial system. It exposes deep structural vulnerabilities in the administration of justice, particularly the failure of oversight agencies to fulfill their statutory and ethical mandates. The evidence suggests a troubling pattern of institutional complicity; wherein judicial misconduct is not only tolerated but actively shielded from accountability. This convergence of unchecked authority and regulatory failure poses a serious threat to constitutional safeguards, compromises the rule of law, and undermines public confidence in the integrity of the judiciary.

II. Background and Context: The Genesis of the Retaliation

A. The Underlying Custody Case and Allegations of Judicial Bias

The origins of this controversy trace back to a protracted and highly contested custody dispute between Erin Gerlach and Shawn Freeman, a SWAT officer with a documented history of domestic violence and abuse allegations. Judge Charlene Jackson presided over this case nearly from its inception, making numerous rulings that would later become the subject of extensive public scrutiny, formal complaints, and allegations of misconduct.

Over the course of the proceedings, Gerlach compiled extensive documentation alleging systematic judicial bias, procedural irregularities, and violations of constitutional rights. Among her claims were assertions that Judge Jackson disregarded substantiated evidence of domestic violence, muted the courtroom recording system, failed to follow Arizona Rules of Family Law Procedure, issued rulings absent proper hearings, violated due process, and exhibited consistent favoritism toward Freeman.

The custody case itself became a lightning rod for broader concerns about Arizona's family court system, with multiple advocacy groups, legislators, and concerned citizens raising questions about judicial accountability and the protection of vulnerable children and families. Gerlach's case was cited in

legislative hearings, public petitions, and formal complaints to various oversight bodies.

B. The Whistleblower Campaign: A Pattern of Protected Civic Engagement

Beginning in early 2023, Erin Gerlach embarked on a sustained campaign of civic engagement and judicial accountability. This effort, legally protected under the **First Amendment**, involved submitting formal complaints to numerous governmental bodies, including the Arizona Commission on Judicial Conduct, the Governor's Office, the Attorney General, other government agencies and various presiding judges including Presiding Judge Ronda Fisk, Presiding Judge Joseph Welty, and former Presiding Judge Bruce Cohen. These filings meticulously documented alleged instances of judicial misconduct, supported by court transcripts, public records, and corroborating evidence.

Gerlach's advocacy extended well beyond formal institutional channels. It encompassed a broad spectrum of civic activities aimed at exposing systemic deficiencies within Arizona's family court system, including public records requests, media collaboration, and grassroots activism.

Her initiatives also included submitting a judicial recall petition to the Maricopa County Board of Elections and reaching out to federal agencies, such as

the Department of Justice and the Federal Bureau of Investigation, to seek external oversight. Gerlach's continued role in these efforts is driven by a dual imperative: the civic duty to expose institutional failures and the moral obligation, as a mother, to protect children subjected to unconstitutional and harmful rulings.

In the absence of meaningful institutional accountability, Gerlach, alongside other protective parents, has assumed a role traditionally reserved for oversight agencies. These individuals have become de facto watchdogs, documenting misconduct and advocating for systemic reform. Their efforts underscore a profound institutional void where those entrusted with judicial oversight have abdicated their responsibilities, leaving families vulnerable to the unchecked abuse of power.

Gerlach's actions were not merely legally protected; they were ethically compelled. Her advocacy reflects both a principled defense of constitutional rights and a deeply personal commitment to safeguarding the welfare of children caught in a system that, in her experience, failed to uphold its most basic obligations.

1. Public Testimony Before the Joint Legislative Ad Hoc Committee on Family Court Orders

On June 16, 2025, Erin Gerlach provided powerful firsthand testimony to the Joint Legislative Ad Hoc Committee on Family Court Orders in Phoenix, Arizona.

During her testimony, she detailed the systemic failures she experienced within the family court system, stating that her case involves documented domestic violence and child abuse against her daughter. She maintained that her ex-partner, a police officer, has been able to evade accountability due to his position.

Gerlach recounted that her ex-partner's alleged lies resulted in a judge issuing warrants for her arrest and subsequent criminal charges for custodial interference, which she believes were a direct result of her efforts to protect her daughter. She also alleged that the abuse has continued, with her ex-partner filing police reports in an effort to compel her to return to Arizona. She further revealed that the judge in her case had seen photos and videos of the abuse but took no action.

Acknowledging the risk of speaking out, Gerlach told the committee she knew she would face retaliation and likely end up back in jail. Despite this, her resolve remained clear: **"If I can't save my own child, at least I can help save someone else's."** She informed the committee that a civil restraining order had been filed against her, which explicitly considered her lawful activities, such as filing complaints and speaking to legislators, as "harassment."

Senator Finchem responded to Gerlach's testimony by assuring her she has Constitutionally Protected First Amendment Rights. In her recommendations for

reform, Gerlach called for the defunding of "these organizations that aren't doing anything," specifically naming the Commission on Judicial Conduct and the State Bar of Arizona. In a press release about the Ad Hoc Committee on Family Court Orders, Senator Finchem stated **"The family court issues being brought forward are no longer recognized as just a statewide concern, but a nationwide crisis. Traumatized parents and children have inundated my phone and email accounts, begging to have their voices heard."**

C. The Institutional Response

The institutional response to Erin Gerlach's allegations of judicial misconduct reflects a troubling departure from the principles of impartiality and procedural integrity that govern judicial oversight. Rather than initiating a good-faith investigation into the substantive claims presented, the Arizona Commission on Judicial Conduct—an entity statutorily charged with ensuring judicial integrity—engaged in conduct that raises serious constitutional and ethical concerns.

According to sworn statements made by Judge Charlene Jackson the Arizona Commission on Judicial Conduct did not respond to the complaints filed against her with impartiality or procedural rigor. Instead, Jackson claimed that the Commission alerted court security, engaged in undisclosed coordination with her, and initiated surveillance of Erin Gerlach's online activity after Gerlach expressed

her intent to speak to the media about her custody case. Notably, Jackson claimed that Gerlach's intent to engage with the media was internally characterized by the Commission as a "threat," a framing that suggests a deliberate effort to suppress constitutionally protected expression.

This conduct constitutes a fundamental distortion of the oversight process. Agencies designed to function as safeguards against judicial abuse were repurposed as instruments of retaliation, thereby violating the First Amendment rights of a litigant lawfully seeking redress. Rather than serving as neutral guardians of judicial accountability, these institutions facilitated misconduct by colluding with the very judge under investigation.

The Commission's refusal to investigate dozens of complaints submitted by Gerlach and other similarly situated individuals—combined with Jackson's admission of coordinated surveillance—raises grave concerns under both constitutional and administrative law. The chilling effect on Gerlach's speech, the targeted harassment she endured, and the erosion of public trust in the state's only judicial oversight body collectively represent a breakdown in institutional legitimacy. Equally concerning is the apparent violation of Gerlach's right to privacy. Available evidence suggests that oversight officials may have unlawfully accessed personal data belonging to litigants and critics, placing them under

surveillance for engaging in constitutionally protected activities such as submitting public records requests, contacting the press, and posting commentary on judicial conduct. This extrajudicial monitoring implicates not only oversight personnel, but also court security officers, law enforcement agents, and any individuals who knowingly participated in the surveillance of a litigant exercising her civic and constitutional rights.

Such coordinated behavior reflects a systemic abuse of public authority. Institutions entrusted with upholding the rule of law were instead weaponized to intimidate whistleblowers and shield judicial actors from scrutiny. The implications are legally and ethically staggering: **if a sitting judge can admit under oath to surveilling a litigant in collaboration with an oversight body, what remains undisclosed?** What additional unconstitutional actions have been taken against Gerlach—or against other litigants who have engaged in lawful criticism of the judiciary?

The normalization of retaliatory surveillance against litigants who expose judicial misconduct signals not merely a failure of oversight, but a dangerous erosion of constitutional protections and a collapse of institutional accountability. Gerlach's case is not an isolated anomaly—it is a harbinger of systemic dysfunction. Unless these practices are exposed, adjudicated, and structurally

remedied, the foundational principles of justice in Arizona risk being irreparably compromised.

In response to these institutional failures, Gerlach has intensified her advocacy efforts. She has engaged directly with lawmakers to call for the defunding and structural replacement of oversight agencies that have demonstrably failed in their mandate. Her position reflects a growing consensus that these entities, far from protecting Arizona's citizens—particularly vulnerable children—have become complicit in perpetuating judicial abuse. Gerlach is also working closely with civil rights and constitutional attorneys to prepare for potential class action litigation, signaling that the pursuit of accountability is entering a new and legally consequential phase.

III. The Restraining Order: A Forensic and Constitutional Analysis

A. Abuse of Process and Retaliatory Intent

The timing of the Injunction Against Harassment and the manner in which it was pursued raise significant questions regarding its legitimacy and a clear inference of retaliatory purpose. The petition was filed in March 2025, approximately four months after the last alleged incident of harassment and notably after Gerlach had privatized her social media accounts in November 2024. This delay is inconsistent with any claim of imminent harm or the need for urgent judicial protection, thereby undermining the petition's credibility as a legitimate protective measure.

More critically, the filing coincided precisely with Gerlach's arrest in a custodial interference matter—a case that directly stems from custody orders issued by Judge Jackson herself. Court records confirm that prosecutors cited Jackson's harassment allegations during Gerlach's initial appearance to argue for stricter bond conditions. This procedural overlap reveals that the restraining order served a dual function: not only as a civil filing but as a strategic tool to influence a separate criminal proceeding over which Jackson had no jurisdiction.

The manner in which Gerlach was served with the order further reinforces the inference of retaliatory intent. She was served repeatedly: during two separate court appearances, while incarcerated in California, and again following her extradition to Arizona. These repeated service attempts, executed in coercive and public settings, appear designed to manipulate Gerlach's treatment while in custody and to influence the perceptions of other judicial officers presiding over her hearings. Such conduct, when undertaken by a sitting judge, implicates abuse of process, judicial harassment, influencing a judicial officer, interference with proceedings and violates Gerlach's rights to a fair and impartial tribunal.

Jackson was fully aware that her documented misconduct would be placed on the record in Gerlach's criminal case. The injunction functioned as a preemptive strike: a calculated effort to intimidate Gerlach into silence and discredit her before she could publicly document the judicial misconduct at issue.

But the effort backfired. Judge Jackson's sworn statements inadvertently corroborated Erin Gerlach's longstanding allegations of collusion, bias, and retaliation. The criminal proceedings are now exposing a broader pattern of fraud on the court—perpetrated by Gerlach's opposing party, Officer Freeman; his attorney, Caitlin Andrade; and ratified by Judge Jackson. This includes Freeman's filing of knowingly false police reports, false statements submitted under penalty of perjury to courts in three separate jurisdictions, and repeated false statements to law enforcement.

Andrade, as an officer of the court, knowingly participated in this scheme by abusing legal process, submitting procedurally defective filings, and failing to adhere to basic ethical and procedural standards. Her role in advancing false narratives, enabling perjury, and obstructing lawful oversight reflects a serious breach of professional responsibility and a deliberate misuse of her position.

Together, these actions constitute not only fraud on the court, but a coordinated effort to suppress a protective parent's constitutional rights through deception, retaliation, and selective prosecution. The pattern of misconduct implicates violations under 18 U.S.C. § 241—conspiracy against rights—and demands immediate evidentiary scrutiny.

What was once concealed through institutional privilege is now being dragged into open court, where each falsehood, each abuse of process, and each ethical violation will be documented and litigated.

B. Constitutional and Criminal Violations

The civil harassment injunction filed by Judge Jackson against Erin Gerlach is predicated on a series of demonstrable falsehoods and material misrepresentations and violates several core constitutional and statutory provisions.

1. First Amendment: The Criminalization of Protected Speech

Jackson's petition provides a detailed inventory of Gerlach's civic activities, explicitly characterizing them as "harassment." The activities cited in the petition—including filing complaints with oversight bodies, submitting public records requests, engaging with elected officials, and speaking publicly about judicial misconduct—are unequivocally protected under the **First Amendment** to the United States Constitution. The U.S. Supreme Court has long held that criticism of public officials, particularly judges, occupies the highest tier of constitutional protection (*New York Times Co. v. Sullivan*, 376 U.S. 254 (1964)).

The restraining order functions as a **prior restraint** on speech by prohibiting Gerlach from engaging in future speech about Jackson's conduct, regardless of its

truthfulness or public importance. The Supreme Court has consistently held that prior restraints on speech—restrictions imposed before publication or expression—are presumptively unconstitutional and subject to the most exacting scrutiny. The petition explicitly sought to block Gerlach's testimony before the Arizona Legislature, a classic example of using a legal process for an ulterior, retaliatory purpose.

Beyond its immediate impact, the injunction exerts a chilling effect on other litigants, advocates, and whistleblowers. The threat of retaliatory enforcement discourages lawful oversight, deters public participation in democratic processes, and undermines the transparency essential to judicial legitimacy. When a judge uses the courts to suppress constitutionally protected speech, the harm extends beyond the individual—it reverberates through the legal system itself.

Moreover, this conduct calls into question Judge Jackson's competency to serve as a judicial officer. Familiarity with and respect for foundational constitutional principles—particularly the First Amendment—is not optional for members of the judiciary. It is a baseline requirement. The apparent failure to distinguish between protected oversight and unlawful harassment suggests a fundamental misunderstanding of constitutional doctrine and judicial ethics. Such

a deficiency undermines public confidence in the judiciary and warrants serious scrutiny by oversight bodies.

2. Substantive Due Process and Judicial Bias

A foundational principle of judicial ethics requires that judges recuse themselves from proceedings in which their impartiality might reasonably be questioned due to personal interest, prior involvement, or animus toward a party. This standard is codified in **Canon 2.11(A)** of the Arizona Code of Judicial Conduct and reinforced by longstanding constitutional jurisprudence.

In the case of Erin Gerlach, Judge Charlene Jackson not only failed to recuse herself, but actively continued to preside over custody proceedings while harboring demonstrable personal grievances against the litigant. In her sworn petition for an injunction against harassment, Jackson retroactively alleged that Gerlach's lawful oversight activities constituted harassment. More troublingly, Jackson admitted to participating in criminal investigations targeting Gerlach while still assigned to her family court case.

The agency with which Jackson allegedly collaborated in these investigations is the employer of Gerlach's opposing party in the custody matter—a police officer. This creates a dual conflict of interest: Jackson was simultaneously adjudicating a

case involving a member of the law enforcement agency she was working with and targeting the opposing litigant in that same case through extrajudicial means. Such entanglement violates both the appearance and substance of judicial neutrality.

If Judge Jackson genuinely believed Gerlach's conduct constituted harassment or criminal behavior, she had a legal and ethical obligation to step away from the case. Her failure to do so not only undermine the integrity of the proceedings but also violates the fundamental tenets of due process. The United States Supreme Court's decision in *Tumey v. Ohio*, 273 U.S. 510 (1927), established that due process requires not only an unbiased judge, but also the absence of circumstances that would tempt a judge to be biased. Jackson's continued rulings against Gerlach—while simultaneously alleging personal victimization and participating in retaliatory enforcement—fall squarely within the category of impermissible judicial conduct contemplated by *Tumey*.

In addition to the conflict of interest, Judge Jackson engaged in a sustained pattern of procedural irregularities that further compromised Gerlach's constitutional rights. Nearly every motion filed by Gerlach was denied via one-word summary orders, devoid of explanation, reasoning, or legal analysis. This practice obstructs justice and effectively forecloses meaningful appellate review.

The Arizona Rules of Family Law Procedure require that judicial rulings be supported by findings and conclusions sufficient to permit appellate scrutiny. Jackson's repeated failure to meet this standard constitutes procedural misconduct.

Moreover, Jackson allegedly admitted—verbally and informally—to intentionally formatting her jurisdictional ruling in a manner that would render it non-appealable. If substantiated, this admission would reflect a deliberate attempt to evade oversight and insulate her rulings from review. Such conduct is incompatible with the role of a neutral adjudicator and further supports the conclusion that Jackson's actions were retaliatory in nature.

Taken together, these facts implicate both **substantive due process violations** and **judicial ethics breaches**. They also raise serious questions about Judge Jackson's fitness to serve and her understanding of the constitutional limits of judicial authority. A judge who collaborates with the employer of a litigant's adversary in criminal investigations, while continuing to rule on that litigant's case, cannot reasonably claim impartiality. Such conduct demands immediate scrutiny by judicial oversight bodies and may warrant removal from the bench.

3. Equal Protection and Selective Enforcement

The selective enforcement evident in Judge Charlene Jackson's targeting of Erin Gerlach—while ignoring similar public criticism from other Maricopa County family court litigants—raises serious concerns under the **Equal Protection Clause** of the Fourteenth Amendment. Public records indicate that hundreds of family court litigants in Arizona have criticized judges and court procedures, yet Gerlach appears to be the only individual subjected to legal retaliation via a judicial harassment petition and judicial stalking.

This disparate treatment suggests that enforcement was not based on a neutral or consistently applied legal standard but rather on the content, visibility, or effectiveness of Gerlach's advocacy. The Supreme Court has long held that selective enforcement—especially when it targets individuals for exercising protected speech—violates equal protection if it is motivated by impermissible considerations such as viewpoint discrimination, personal animus, or retaliation. As the Court established in *Yick Wo v. Hopkins*, 118 U.S. 356 (1886), even a facially neutral law can be found unconstitutional if it is enforced in a discriminatory manner.

4. Perjury and Fraudulent Inducement

Jackson's petition is predicated on a series of demonstrable falsehoods and material misrepresentations, many of which appear calculated to mislead the court, discredit the respondent, and obscure the judge's own misconduct.

- **False Claims About Warrants:** Jackson swore under oath that she had only issued one warrant in her career as a superior court judge. This statement is contradicted by public records revealing multiple warrants issued by Jackson, including several in Gerlach's case alone. The issuance of warrants is a fundamental judicial function, making Jackson's claimed ignorance of her own actions implausible. This misrepresentation appears calculated to discredit Gerlach's public statements about Jackson's judicial conduct and may constitute **perjury** under **A.R.S. § 13-2702**.
- **Denial of Conflicts of Interest:** Judge Charlene Jackson has categorically denied presiding over a case involving her niece, Paige Jackson. However, publicly available screenshots from the official Maricopa County Superior Court docket identify Judge Jackson as the assigned judicial officer in Paige Jackson's matter. This sequence of events raises serious concerns regarding the integrity of case assignment procedures and the potential concealment of judicial

conflicts of interest. If Judge Jackson knowingly denied her assignment to a case involving a close family member, such a denial may constitute **perjury**.

- **Material Misrepresentation in Judicial Appointment:** The assertion that Judge Charlene Jackson was less than forthright in her application for judicial appointment is substantiated by publicly verifiable discrepancies between her official submissions and her own professional representations. Jackson's application to the Arizona Governor's Office and Judicial Nominating Committee, as well as her official biography on the Maricopa County Superior Court website, omit several judicial and legal roles she has publicly claimed in other contexts. These omissions pertain directly to her qualifications and experience and were submitted to public offices for the purpose of securing judicial appointment. These actions may constitute the submission of **false instruments** for filing in violation of **A.R.S. § 39-161**.
- **Reckless Accusations and Institutional Collusion:** Jackson's sworn civil harassment filing contains a series of unsubstantiated accusations that reflect a pattern of legal abuse and institutional complicity. Of particular concern is her claim that Erin Gerlach sent

anonymous packages exposing judicial corruption to the private residences of other judicial officers. While Gerlach has consistently denied this, Jackson's public naming of Gerlach as the sender—made under oath and without evidentiary support—compromised a legitimate criminal investigation and may constitute **obstruction of justice**. Most disturbingly, Jackson admitted that other judges are using a specific police department to obtain personal information about their critics.

5. Manipulation of the Judicial Record and Due Process Violations

Judge Charlene Jackson's public assertions regarding her lack of control over courtroom recording systems are contradicted by sworn affidavits detailing a pattern of missing or manipulated audio during critical proceedings. This recurring issue, including the disappearance of audio after Jackson's admission of a "**personal interest**" in a case and during a hearing where she admitted to intentionally placing a fraudulent jurisdictional ruling in a non-appealable format, suggests deliberate interference with the official judicial record. In both cases, the portion of the audio where Jackson made those statements is missing. Such conduct, which obstructs appellate review and conceals judicial misconduct, may

constitute tampering with a public record—a Class 6 felony under **A.R.S. § 13-2407**.

Furthermore, the intentional muting or alteration of recordings directly violates a litigant's **Fourteenth Amendment due process rights**. An accurate and complete record is fundamental to safeguarding procedural fairness and ensuring the right to a meaningful appeal. Jackson's failure to investigate these documented discrepancies or even attempt to obtain technical assistance despite numerous complaints from litigants and attorneys reinforces concerns that her actions represent an intentional pattern of concealment incompatible with her ethical obligations and raise serious questions about her fitness to serve.

6. The Substantive and Procedural Breaches Related to Verified Claims of Victimhood

Judge Charlene Jackson's assertion in her petition that Erin Gerlach fabricated her status as a victim of domestic violence is directly contravened by an extensive evidentiary record, including police reports and official victims' rights forms from multiple jurisdictions. The veracity of this claim is further undermined by Jackson's prior admission in a minute order that she disposed of Gerlach's exhibits without review. This conduct, which disregards the findings of law enforcement and dismisses substantiated victimhood, constitutes a material breach of judicial ethics and compromises the integrity of the judiciary.

Moreover, Jackson's public statements about Gerlach's active custody and criminal cases, made despite her acknowledgment of ethical prohibitions against such commentary, violated judicial conduct rules and interfered with the integrity of ongoing proceedings. The inclusion of these legally irrelevant and unsubstantiated claims in a civil harassment petition appears to be a retaliatory misuse of judicial authority, intended to impugn a litigant's credibility in concurrent legal matters. This behavior is inconsistent with the impartiality, restraint, and due process obligations required of a judicial officer.

7. Misconduct in Office

Judge Charlene Jackson's categorical denial of misconduct stands in stark contrast to a substantial and well-documented pattern of violations that implicate core principles of judicial ethics, constitutional governance, and statutory obligations under Arizona law. Jackson's conduct, which includes retaliatory legal filings, the making of false statements under oath, the improper use of public resources, the concealment of material conflicts of interest, and the subversion of due process, satisfies the definition of misconduct in office. The initiation of a personal restraining order against a litigant who had lawfully filed judicial complaints and exposed misconduct represents a retaliatory act cloaked in judicial authority and a deliberate effort to silence a whistleblower and conceal misconduct.

By reframing constitutionally protected speech as “harassment” and invoking her judicial title to lend credibility to a personal legal action, Jackson blurred the line between public office and private interest.

Public records directly contradict Jackson’s sworn denials regarding the issuance of warrants and her involvement in a case concerning her niece. Furthermore, she is alleged to have manipulated courtroom audio systems, muting or deleting segments of the official record to conceal procedural irregularities and foreclose meaningful appellate review. These actions obstructed the litigant's constitutional rights and illustrate a deliberate effort to obstruct justice. The alleged misuse of public resources, including law enforcement databases and judicial personnel, for personal retaliation represents a gross misappropriation of taxpayer funds and implicates serious privacy and surveillance violations. In sum, Jackson's conduct meets and exceeds the legal and ethical thresholds for misconduct in office, representing a profound breach of public trust and a systemic threat to the integrity of the judiciary and the constitutional rights of those who seek redress within it.

8. Issuing Warrants on Falsified Affidavits

The issuance of a warrant for a minor child, with permission for private property entry, was predicated on an affidavit replete with falsehoods, procedural

defects, and material misrepresentations. This act constitutes a violation of the **Fourth Amendment's** protection against unreasonable searches and seizures. The record reflects that the litigant, Erin Gerlach, submitted multiple motions alerting the court to these deficiencies, including statements that contradicted prior sworn declarations and an admission from the opposing counsel that the underlying order had not been served. Despite this substantial evidence, Jackson summarily denied each motion without explanation, thereby endorsing a strategy of ambush that subverted procedural due process. This knowing approval of relief based on a deceptive instrument constitutes judicial complicity in a fraud upon the court. The resulting order placed the child and the litigant in harm, foreclosed meaningful appellate review, and amounted to a misuse of judicial authority for a retaliatory purpose.

The issuance of this warrant, in addition to others documented in public records, also contradicts Jackson's sworn testimony that she had issued only one warrant in her career, raising further concerns of perjury under **A.R.S. § 13-2702**.

9. Federal Criminal and Civil Rights Implications

Judge Charlene Jackson's conduct may give rise to federal civil rights liability under **42 U.S.C. § 1983**, which provides a cause of action against state actors who violate constitutional rights under color of law. While judicial officers

are generally protected by judicial immunity for actions taken within their official capacity, this immunity does not extend to non-judicial conduct or actions taken in clear absence of jurisdiction.

Additionally, the coordinated nature of the alleged misconduct spanning judicial actors, law enforcement personnel, oversight agencies, and legal counsel raises serious concerns under federal criminal statutes. The systematic use of government resources to surveil, harass, and retaliate against a whistleblower through law enforcement, court security, and oversight bodies may constitute a conspiracy to deprive citizens of their civil rights. Under **18 U.S.C. § 242**, it is a federal crime for any person acting under color of law to willfully deprive another of rights protected by the Constitution or laws of the United States. This includes retaliation for protected speech, denial of due process, and misuse of judicial authority to silence dissent.

The alleged misconduct against Erin Gerlach may also satisfy the elements of a **Racketeer Influenced and Corrupt Organizations Act (RICO)** violation. RICO applies to patterns of criminal activity conducted through an "enterprise," which may include public institutions and government officials.

A plausible RICO theory could identify the enterprise as an "association-in-fact" involving Judge Jackson, Officer Shawn Freeman, his attorney Caitlin

Andrade, and other individuals allegedly colluding with court-appointed professionals and law enforcement personnel. The alleged pattern of racketeering activity—fraudulent filings, falsified affidavits, improperly obtained warrants, and retaliatory legal actions—appears directed toward suppressing complaints and punishing a protective parent.

10. Obstruction of Justice

The manipulation of the judicial record and the use of judicial process to impede a criminal matter implicate both federal and state laws governing obstruction of justice. The federal statute, **18 U.S.C. § 1503**, prohibits any person from corruptly influencing, impeding, or endeavoring to obstruct the due administration of justice. Similarly, Arizona law, **A.R.S. § 13-2409**, defines obstruction as using or threatening to use violence, force, or a false or misleading instrument or information to obstruct, delay, or prevent an investigation or the prosecution of a crime.

The deliberate muting or deletion of official court recordings, which are essential for appellate review and procedural integrity, constitutes a direct act of obstructing justice under both statutes. Similarly, the alleged use of a civil restraining order to influence a separate criminal proceeding and secure more punitive bond conditions represents a concerted effort to impede the fair

administration of law. This pattern of conduct reflects a deliberate strategy to subvert the judicial process, rather than a mere overreach of authority.

The act of pursuing a restraining order and participating in investigations against a litigant while simultaneously presiding over her case is a direct and corrupt attempt to silence a whistleblower and prevent the exposure of judicial misconduct. Judge Jackson's alleged efforts to keep the litigant "quiet" and avoid accountability for her own actions fall squarely within the scope of these obstruction statutes.

11. The Docketing Dispute and Failure to Correct the Record

A central and critical element of Jackson's harassment claim rests on Erin Gerlach's dissemination of a screenshot of the Maricopa County Superior Court website that identified Jackson as the assigned judge in her niece's case. This allegation is legally and factually untenable. The public identification of Jackson as the assigned judicial officer, even if the result of an administrative or docketing error, is a matter of official record. Gerlach's disclosure of this verifiable information—drawn directly from the court's own docket—cannot reasonably be construed as harassment. Such a presumption is foundational to public trust in the legal system, which relies on the accuracy of official judicial records. To characterize the dissemination of such information as malicious or conspiratorial is

to misrepresent both the nature of the disclosure and the legal protections afforded to individuals engaged in public oversight of judicial conduct.

It is a matter of record that Gerlach did not allege that Judge Jackson issued rulings or took substantive action in her niece's case; her assertion was limited to the fact of assignment as reflected in the docket. Moreover, Gerlach formally notified Jackson and multiple other judicial authorities, including Presiding Judges Joseph Welty and Ronda Fisk, as well as former Presiding Judge Bruce Cohen, of the issue. She also filed a formal complaint with the Arizona Commission on Judicial Conduct and submitted motions directly in Jackson's courtroom that raised these allegations, which were summarily denied without explanation.

If the docket entry was erroneous, Judge Jackson had multiple procedural avenues available to correct the record or clarify the assignment. These included administrative correction, responsive clarification in court filings, or communication with presiding judicial officers. Her failure to pursue any of these remedies, coupled with her decision to address the issue only months later in the context of a personal restraining order petition, raises serious concerns regarding her motives and the credibility of her denial.

Moreover, Jackson's attempt to reframe Gerlach's reliance on official court records as defamatory or conspiratorial reflects a troubling inversion of judicial

accountability. By asserting that the court's own docketing system produced false or misleading information, Jackson implicitly calls into question the integrity of the Superior Court's public-facing infrastructure. This raises a separate and serious issue: either the assignment of her niece's case to her was not random, or the Maricopa County Superior Court's docketing system is so unreliable that it routinely misidentifies judicial assignments. Both possibilities warrant independent investigation.

Finally, Jackson's decision to make these allegations in a sworn petition—while identifying herself as a sitting Superior Court Judge—amounts to a public and defamatory characterization of Gerlach's conduct, made under color of judicial authority. This conduct not only undermines public confidence in the judiciary but also suggests a deliberate effort to suppress oversight and retaliate against a litigant for engaging in constitutionally protected speech.

C. Institutional Complicity and Coordinated Retaliation

1. The Arizona Commission on Judicial Conduct (ACJC)

Judge Charlene Jackson's sworn statements reveal a deeply troubling response by the Arizona Commission on Judicial Conduct. Rather than investigating Erin Gerlach's allegations of judicial misconduct, the Commission appears to have engaged in retaliatory surveillance. According to Jackson's own

restraining order petition, the Commission alerted court security and initiated monitoring of Gerlach's online activity—actions that suggest a punitive response to a constitutionally protected complaint.

When Gerlach reported that Jackson had been assigned to a case involving her niece—a clear conflict of interest—the Commission did not investigate. Instead, it questioned how Gerlach had discovered the familial relationship. Gerlach subsequently submitted public records herself, after conducting independent research. The Commission's apparent attempt to reframe this lawful inquiry as "cyberstalking" is legally indefensible and reflects a failure to fulfill its statutory mandate.

Rather than functioning as an independent check on judicial misconduct, the Commission became complicit in suppressing oversight. This conduct undermines its credibility and erodes public trust in Arizona's judicial accountability framework. Gerlach only learned of the surveillance because Jackson disclosed it in her petition, raising serious concerns about covert monitoring of other complainants.

Such institutional behavior implicates constitutional protections against retaliation, viewpoint discrimination, and the suppression of dissent. The weaponization of oversight mechanisms to shield judges from scrutiny and

intimidate complainants is incompatible with principles of transparency, fairness, and democratic governance. It reflects a systemic breakdown in the very safeguards designed to protect the public from judicial abuse.

2. Court Security and Law Enforcement Coordination

Judge Charlene Jackson's own admissions reveal a troubling pattern of coordinated surveillance and retaliatory enforcement targeting litigant Erin Gerlach for engaging in constitutionally protected activities. The involvement of court security, local law enforcement, and potentially federal fusion centers appears not to have been prompted by any credible threat, but rather by Gerlach's exercise of her First Amendment rights—specifically, her efforts to petition the government, expose judicial misconduct, and engage in lawful oversight.

Compounding this concern is the fact that the law enforcement agency pursuing Gerlach for custodial interference employs her opposing party in the custody dispute—a SWAT officer. Despite this disqualifying conflict of interest, Jackson admitted to participating in investigative efforts against Gerlach while continuing to preside over the custody case. The agency lacked jurisdiction over Gerlach's residence, Jackson's residence, and the courthouse, further underscoring the impropriety of its involvement.

The diversion of public safety resources to monitor and suppress a litigant's speech constitutes a serious breach of public trust. At a time of constrained law enforcement capacity, the use of these resources for personal retaliation rather than public protection reflects a misuse of governmental authority.

This conduct amounts to a form of judicial stalking—the weaponization of institutional power to silence dissent. It raises grave constitutional concerns under the First and Fourteenth Amendments, implicating both free speech and due process. Participating agencies, by enabling surveillance without lawful justification, jeopardized their ethical obligations and professional certifications in service of a judge's apparent personal vendetta.

Such coordination between judicial officers and enforcement agencies to suppress criticism undermines the principles of democratic governance. It demands immediate and transparent investigation to protect individual rights and restore institutional integrity.

3. Prosecutorial Complicity and Selective Prosecution

The reliance on Judge Charlene Jackson's restraining order allegations to influence Erin Gerlach's criminal proceedings reflects a troubling degree of prosecutorial complicity. Court records indicate that prosecutors cited

unsubstantiated claims of harassment to justify suggesting enhanced bond conditions, aligning prosecutorial discretion with a retaliatory judicial posture. This conduct undermines the principle of prosecutorial neutrality and raises serious concerns about the integrity of the custodial interference case.

Equally problematic is the concealment of the origins of the custody orders Gerlach allegedly violated. These orders were issued by a judicial officer with a documented history of misconduct, undisclosed bias, tampering with the courts record, due process violations and substantial procedural irregularities—including the absence of proper jurisdictional findings required under Arizona law. Such foundational defects call into question the legal validity of the underlying charges.

Judge Jackson's continued involvement in the criminal proceedings, despite her personal connection to the family law matter and her coordination with Gerlach's opposing party—a law enforcement officer employed by the prosecuting agency—constitutes a clear breach of judicial ethics. Her admitted participation in investigative efforts while presiding over the custody case violates standards of impartiality and judicial neutrality.

The coordinated actions of judicial and prosecutorial actors to pursue charges against a protective parent, while disregarding evidence of perjury, misconduct, and collusion involving Gerlach's opposing party, his attorney Caitlin Andrade,

and Judge Jackson herself, raise serious constitutional concerns. As officers of the court, these individuals are held to heightened ethical standards. Their entanglement in a retaliatory enforcement scheme reflects selective prosecution and a systemic failure to uphold the rule of law.

This conduct warrants immediate and transparent investigation—not only to protect the rights of the individual targeted, but to restore public confidence in the independence and integrity of Arizona's judiciary.

IV. Conclusion: A Constitutional Crisis in Arizona's Judiciary

The civil harassment injunction filed by Judge Charlene Jackson against litigant Erin Gerlach is not merely an isolated act of judicial misconduct. It exemplifies a broader constitutional breakdown within Arizona's judiciary—one marked by retaliatory abuse of legal process, institutional complicity, and the erosion of foundational safeguards essential to democratic governance.

The evidentiary record demonstrates that the injunction was not a legitimate protective measure, but a calculated misuse of judicial authority. The petition's reliance on demonstrably false assertions, its strategic timing following Gerlach's oversight efforts, and its attempt to criminalize constitutionally protected speech reveal its retaliatory nature. This action constituted a prior restraint on speech, a violation of due process, and an abuse of legal process. It transformed a protective order—intended to shield individuals from genuine harm—into a weapon of suppression aimed at obstructing oversight and chilling civic engagement.

Gerlach has consistently maintained that Jackson's intent was to intimidate her into silence and deter further exposure of judicial misconduct. Yet, as Gerlach herself noted, Jackson appears unfamiliar with the Streisand Effect—the phenomenon whereby attempts to suppress information only amplify public

attention. Rather than silencing criticism, Jackson's retaliatory tactics have intensified scrutiny of her conduct, drawing national attention to a documented history of judicial abuse. This includes the issuance of fraudulent custody orders, the pursuit of selectively enforced criminal charges, the initiation of harassing investigations, and the filing of a restraining order grounded in demonstrable falsehoods.

More troubling is the institutional response that enabled this misconduct. Oversight bodies failed to investigate credible allegations. Law enforcement agencies coordinated with a sitting judge to surveil and target a litigant engaged in lawful oversight. Prosecutorial authorities permitted themselves to be used as instruments of judicial reprisal. These failures reflect not isolated lapses, but a systemic collapse of accountability mechanisms. They raise a critical constitutional question: if a sitting judge can weaponize the legal system against a litigant for exercising protected rights, what prevents the same from occurring with impunity in other cases?

Far from concealing misconduct, Jackson's actions have catalyzed a broader reckoning with the failures of Arizona's family court system. Gerlach's case has become a focal point for public outrage, legislative inquiry, and demands for

reform—exposing not only Jackson's conduct but the institutional structures that enabled it.

Despite repeated attempts to silence her, Gerlach has made it unequivocally clear that she will not retreat. Her resolve remains steadfast in the face of intimidation, institutional obstruction, and personal hardship. She continues to advocate not only for justice in her own case, but for systemic reform that protects every child and parent subjected to Arizona's family court system. Her mission is rooted in a fundamental demand: that due process be upheld, that children be protected from harm, and that the judiciary cease violating the civil rights it is sworn to defend.

Until those goals are accomplished, Gerlach's efforts will persist. Her courage stands as a testament to the power of individual resistance against systemic injustice. Her case may yet become the catalyst for long-overdue reform, not only in Arizona but in jurisdictions across the country grappling with similar failures.

Federal intervention is not merely appropriate—it is imperative. The pervasive nature of the constitutional violations, the inadequacy of state-level remedies, and the ongoing threat to fundamental rights demand immediate and comprehensive federal oversight. The United States Department of Justice must

act to restore constitutional protections, reestablish institutional accountability, and ensure that the machinery of justice serves its intended public function.

Recent legislative hearings co-chaired by Arizona State Senator Mark Finchem have further illuminated the scale of the crisis. As chair of the Joint Legislative Ad Hoc Committee on Family Court Orders, Senator Finchem has described the situation as a "nationwide crisis," citing hundreds of testimonies from parents and children alleging civil rights violations, judicial overreach, and coercive practices. The committee has heard disturbing accounts of unlicensed professionals influencing custody outcomes, prolonged litigation draining families of financial resources, and judges issuing rulings that defy statutory and procedural standards.

Investigative reporting has also exposed a network of court-appointed professionals operating under the Association of Family and Conciliation Courts (AFCC), accused of suppressing evidence of abuse and perpetuating a profit-driven custody pipeline. These revelations suggest that Arizona's family courts are not merely dysfunctional—they are structurally compromised by entrenched interests and systemic abuse.

The case of Judge Jackson's retaliatory injunction may ultimately be remembered as a pivotal moment in the pursuit of judicial accountability and

constitutional reform. It has laid bare the vulnerabilities in Arizona's system of checks and balances and underscored the urgent need for structural safeguards. Whether this moment catalyzes meaningful change or becomes another chapter in institutional failure will depend on the response of federal authorities, legislative bodies, and the public at large.

The constitutional promise of equal justice under law is at stake. Delay in addressing these violations risks irreparable harm to democratic institutions and further erosion of public trust. The evidence is substantial, the violations are documented, and the need for accountability is urgent. Justice delayed is justice denied—and in this case, delay perpetuates harm to vulnerable families and undermines the constitutional principles that define our democracy.

Gerlach has publicly declared her intent to pursue accountability. In response to the misconduct she uncovered, she has launched a campaign demanding the immediate removal of Judge Charlene Jackson from the bench. She has submitted a formal request for the State of Arizona to audit the Commission on Judicial Conduct and other agencies implicated in her case, citing the extensive public resources expended on retaliatory proceedings. She has also communicated with federal authorities regarding a broader audit, noting that several of the involved agencies receive federal funding and are allegedly misusing those funds to surveil,

harass, and retaliate against a protective mother who resides outside Arizona. This diversion of federally allocated resources from their intended public purpose to unconstitutional retaliation raises serious questions of federal oversight, misuse of public funds, and civil rights violations.

Her efforts reflect a broader movement for transparency, accountability, and reform in Arizona's judiciary—and a refusal to allow the abuse of power to go unchallenged.

V. Violations of Code of Judicial Conduct

This chart summarizes alleged violations of judicial ethics, statutory law, and administrative codes by Judge Charlene Jackson. Each entry identifies the governing rule or statute, the misconduct, and a plain-language description. This chart is a summary and not an exhaustive list of allegations.

Comprehensive Violations Chart – Judge Charlene Jackson

Rule / Statute	Specific Violation	Description
Rule 1.2 – Promoting Confidence in the Judiciary	Retaliatory restraining order undermining trust	By filing a personal restraining order against Gerlach after recusal—based on falsehoods and protected activity—Jackson weaponized her judicial office and created the appearance of bias and abuse, eroding public trust.
	Public commentary in restraining order	Jackson made sworn public statements disparaging Gerlach's character and advocacy, violating the rule against judges undermining confidence in the judiciary by appearing retaliatory and partial.

	False denials in sworn filings	She denied issuing multiple warrants and presiding over her niece's case—contradicted by records—misrepresenting her record and harming judicial credibility.
Rule 2.1 – Giving Precedence to Duties of Judicial Office	Filing retaliatory restraining order while citing events from judicial tenure	Jackson initiated personal litigation based on matters she presided over, prioritizing personal vendetta over impartial duty.
	Using judicial title in personal filings	She identified herself as a "Superior Court Judge" in a sworn affidavit, using her title to lend credibility to personal grievances.
	Concealing conflicts while presiding	She failed to disclose meetings with law enforcement and court security about Gerlach for over a year, while still ruling on her case.

	Participating in investigations while presiding	Coordinated with law enforcement and court staff to surveil and investigate Gerlach while still exercising authority in the case, compromising judicial neutrality.
	Using court infrastructure for retaliation	Directed security to monitor Gerlach's social media and lawful speech using public resources.
Rule 2.2 – Impartiality and Fairness	Continued rulings while biased	Issued adverse rulings while allegedly privately believing Gerlach was harassing her.
	Sham UCCJEA ruling in non-appealable format	Issued a jurisdictional ruling without findings, despite the statutory language saying the court "SHALL" place specific findings on the record. The ruling was intentionally placed in a non-appealable minute entry to block oversight.
	Denial of motions without review	Summarily denied every motion for relief with one-word denials, ignoring evidence of fraud, abuse, and perjury.

	Proceeding without jurisdiction	Jackson held hearings and issued orders after appellate jurisdiction was invoked and admitted to knowingly exceeding authority.
	Permitting fraud/perjury	Allowed opposing party and counsel to file contradictory affidavits and perjury, enabling fraud on the court.
Rule 2.3 – Bias, Prejudice, Harassment	Concealed bias revealed in restraining order	Jackson's RO admitted she allegedly felt harassed for over a year—proving she presided with concealed bias.
	Treating litigant as personal threat	Retroactively reframed Gerlach's advocacy as harassment and threats, contrary to facts and without recusing from the case.
	Coordinated surveillance	Directed law enforcement and security to monitor Gerlach's lawful speech and filings.
	Retaliatory restraining order	Filed 4 months after recusal and after the last alleged act of "harassment." The timing shows intent to retaliate and interfere with Gerlach's pending custodial interference and child custody cases.

	Public defamatory claims	Claimed Gerlach is “pretending” to be a of domestic violence while she also wrote in a minute order that she disposed of Gerlach’s evidence. She cannot reasonably decide either way without reviewing evidence. Jackson making public statements about cases is a direct violation of ethics and whether Gerlach was a victim or “pretending "is not material to Jackson obtaining a restraining order. The claim is clearly defamatory and for the purpose of influencing the new judicial officer on Gerlach’s custody case and interfering with Gerlach's criminal custodial interference proceedings.
	Intimidation tactics	Law enforcement present in courtroom during child custody case, repeated service of RO (7x including in jail and in court), designed to harass and intimidate Gerlach into silence while manipulating her treatment in custody and to influence judicial officers.
	False accusations of	Swore Gerlach sent materials to judges’ homes without evidence—defamatory and retaliatory.

	anonymous packages	
Rule 2.6 – Right to Be Heard	Denying hearings and evidence	Refused to allow Gerlach to speak or present evidence during the UCCJEA conference which violated due process.
	Discarding victim evidence	Disposed of Gerlach's exhibits, then publicly accused her of "pretending" to be a victim of domestic violence despite not weighing any of Gerlach's evidence.
	Denial of meaningful review	One-word denials of motions raising constitutional and statutory violations. Also placing the jurisdictional ruling and other orders in non-appealable minute orders.
Rule 2.9 – Ex Parte Communications	Secret law enforcement coordination	Met with law enforcement, the employer of opposing party about Gerlach without disclosure and continued to issue orders.

	Security surveillance without notice	Directed monitoring of Gerlach's speech outside of proceedings.
	Collecting evidence while presiding	Gathered material later cited in RO, without disclosure to parties.
Rule 2.10 – Judicial Statements	Public commentary in restraining order	Made disparaging sworn claims about Gerlach's character and filings while speaking about Gerlach's active custody and custodial interference cases.
	Misrepresenting lawful speech as misconduct	Cited oversight, records requests and complaints as "harassment" in public filings which not only is a violation of Gerlach's rights to Free Speech and to Petition the Government for Redress but also chills others free speech as they are afraid of facing the same retaliation as Gerlach.
Rule 2.11 – Disqualification	Failure to recuse despite bias	Continued presiding for over a year while allegedly believing Gerlach was harassing her.

	Filing RO based on period presided	Confirms bias and conflicts existed throughout her time assigned to Gerlach's case, undermining rulings.
	Surveillance coordination with ex's agency	Maintained involvement with law enforcement agency tied to opposing party that lacked jurisdiction over Jackson's home, Gerlach's home or the courthouse while presiding over the custody case.
Rule 3.10 – Practice of Law	Practicing law while judge	Publicly acted as attorney for Hualapai Tribe while simultaneously identifying as a Maricopa County Superior Court Judge
A.R.S. § 13–2407 (Tampering with Public Records)	Muting/erasing court audio	Audio missing after Jackson muted FTR system.
	Misfiling jurisdiction rulings	Put jurisdiction decisions in non-appealable minute entries to block review and violate due process.

	Altering/backdating minute entries	Retroactively modified entries without notice to justify rulings and conceal misconduct.
	Omitted tribal work from forms	Failure to disclose legal roles including as an attorney and judge on her application for appointment.
	False filings in RO	Sworn false statements, misrepresentations and intentional omissions became official records including knowingly false defamatory accusations about Gerlach that had nothing to do with her obtaining a RO.
A.R.S. § 13–2409 (Obstructing Investigations)	Ignoring evidence of abuse	Rejected law enforcement reports of Domestic Violence, child abuse, assault, and disorderly conduct and told Gerlach her participating in investigations against their abuser was "harassment," obstructing investigations.

	Retaliatory intimidation	Filed RO and rulings to intimidate Gerlach into silence, obstructing justice.
	Coordinated surveillance	Surveilled Gerlach after she threatened to go to the media about her custody case.
A.R.S. § 13–2703 (False Swearing / Perjury)	False claim of only one warrant	Records show Jackson issued multiple warrants in Gerlach's case alone and warrants in other cases also.
	False "ex parte" claim	Retroactively mischaracterized public post as improper contact. If Jackson believed Gerlach's social media post was "ex-parte" communication she had a duty to report it and recuse herself which she did not.
	Omitted tribal legal roles	Left out material facts on judicial application forms including Serving as an **Attorney** and

		Appellate Judge for the Hualapai Tribe, and the **Washoe Tribe of California and Nevada.**
	False harassment claims in RO	If Jackson believed she was being harassed for over a year by Gerlach, she had a duty to disclose it and recuse from the case, but she did not. Jackson retroactively reframing protected activities such as filing complaints, filing a recall petition, and exposing judicial misconduct on social media is not legally considered "harassment."
	Naming other judges falsely	Improperly implicated others in her RO including several anonymous judges who stalk Gerlach on her behalf and call her anytime she posts on social media. Jackson also name dropped former Presiding Judge Bruce Cohen to lend credibility to her false claims – all of which are now witnesses in Jackson's fraudulent restraining order case.

A.R.S. § 13–2810 (Interference with Judicial Proceedings)	Proceeding after Notice of Appeal	Continued hearings and rulings after divestiture of jurisdiction. Jackson admitted at Gerlach's temporary orders hearing she would not be able to continue if a Notice of Appeal was filed. She then said that she intentionally placed the ruling on jurisdiction in a non-appealable minute order so she continued with the hearing anyway. That portion of the courts audio is missing.
	Sham UCCJEA conference	Parties were provided a few hours' notice via email and were told to stay muted unless spoken to, there was no opportunity to speak, present evidence or participate either during the conference or beforehand. No findings were made on the record as the statute requires, and Jackson intentionally placed her ruling in a non-appealable minute order blocking Gerlach's ability to appeal.

	Retaliatory rulings	Issued sanctions, one-word denials, orders to pay opposing parties attorney's fees while self-represented and warrants in response to Gerlach filing complaints. Jackson mentions those complaints in her RO against Gerlach meaning she clearly harbored a bias against Gerlach for filing judicial misconduct complaints.
	Contempt and Enforcement without service	Jackson issued ex-parte orders for enforcement, contempt and a warrant for a child with permission to enter private property less than 3 days after orders were issued and while opposing counsel admitted Gerlach not been served with the orders that she was accused of being in contempt of. Opposing counsel admitted in writing their intent was to "surprise" Gerlach.

	Warrant based on perjured affidavit	Jackson knowingly issued a warrant for a child with permission to enter private property based on an affidavit for a warrant that was full of false information. Jackson subsequently refused to vacate the orders or quash the warrant despite substantial evidence of perjury and fraud on the court committed by the affiant, a law enforcement officer and his attorney.
	Surveillance while presiding	Acted as both judge and complainant without disclosure for over a year while issuing orders in the custody case, corrupting the process.
	False RO influencing prosecutors	Prosecutors relied on Jackson's false statements from the RO to suggest stricter bond conditions in Gerlach's custodial interference case.

A.R.S. § 38–504(C) (Misuse of Funds/Resources)	Court security surveillance of speech	Directed taxpayer funded court staff to track lawful advocacy after Gerlach threatened to go to the media about her custody case. Jackson also had law enforcement investigate lawful dissent, illegally obtain data about critics and wasted taxpayers' resources on investigations targeting legal constitutionally protected conduct all while she remained on Gerlach's custody case which proves she knew Gerlach's activities were lawful, or she would have recused herself.
	Retaliatory warrants consuming resources	Law enforcement resources have been wasted in numerous Jackson related cases. Gerlach's case has cost taxpayers in Arizona at least a million dollars thus far and she does not even live in Arizona.

	Sham hearings without notice	Consumed court time and resources on invalid proceedings that eventually will be repeated at the expense of taxpayers.
	Using staff for personal RO	Court employees served her personal grievance numerous times in 2 different court hearings over a month apart.
	Repeated service of RO	7 separate services, including in jail in California and after extradition to Arizona for her custodial interference case, wasting resources and intimidating.
Administrative Code (ACJA)	**1–302**: Judicial employees' conduct	Court staff used for improper surveillance of litigants.
	1–303: Court security standards	Surveillance for retaliation, not safety. If Jackson genuinely feared for her safety, ethics

		would have required her to recuse which she did not.
	1–401: Financial admin	Public funds spent monitoring Gerlach unlawfully.
	1–308: Integrity of judiciary	Secret surveillance of complainants proved there is a systemic bias.

Supplemental Narrative of Violations – Judge Jackson

Rule 1.2 – Promoting Confidence in the Judiciary

Judge Charlene Jackson engaged in conduct that undermined public confidence in the integrity of the judiciary. By filing a retaliatory restraining order after recusal, citing protected speech and complaints as "harassment," she created the appearance of personal vendetta rather than impartiality. In the same filing, Jackson made sworn public statements disparaging Gerlach's credibility, labeling her a liar and conspiracy theorist, despite never raising such issues during the active case. These actions demonstrate retaliation and personal bias, eroding confidence in judicial neutrality. Jackson also made false sworn statements, including denying her history of issuing warrants and omitting her prior tribal legal work on her judicial disclosure forms. Misrepresentation of her record and concealment of conflicts only further damaged the public's trust.

Rule 2.1 – Giving Precedence to Duties of Judicial Office

Jackson failed to give precedence to her duties as a judge by allowing personal grievances to influence her official actions. She filed a personal restraining order citing events that occurred while she was presiding, blending personal and judicial roles. She identified herself in filings as a "Superior Court

Judge," leveraging her title for credibility in personal disputes. Jackson concealed her coordination with law enforcement and court security regarding Gerlach, despite continuing to issue rulings in her case. By participating in investigations into Gerlach while still presiding, Jackson abandoned neutrality and improperly mixed her judicial duties with personal interests. She also used taxpayer-funded court infrastructure to conduct surveillance and retaliation, diverting resources from legitimate judicial functions.

Rule 2.2 – Impartiality and Fairness

Judge Jackson demonstrated repeated failures to remain impartial. She issued rulings while harboring concealed bias against Gerlach, later admitting in her restraining order that she felt personally harassed for over a year. She conducted a sham UCCJEA jurisdictional proceeding with inadequate notice, forbidding parties from speaking, and then issued a one-sentence jurisdictional order deliberately placed in a non-appealable format to block oversight. Throughout Gerlach's case, Jackson denied motions without review, discarding evidence of fraud, abuse, and perjury, while consistently favoring the opposing party. She knowingly proceeded with hearings after a Notice of Appeal was filed, exceeding her jurisdiction. Moreover, she allowed the opposing party and counsel

to commit fraud on the court by submitting contradictory affidavits without consequence, demonstrating bias and partiality.

Rule 2.3 – Bias, Prejudice, Harassment

Jackson repeatedly displayed bias, prejudice, and harassment toward Gerlach. Her restraining order revealed that she believed Gerlach was harassing her for over a year, confirming that she presided with concealed bias. She treated Gerlach's lawful complaints and public advocacy as personal threats. She coordinated surveillance with law enforcement and court security, directing them to harass, stalk, and monitor Gerlach's speech, public records requests, and advocacy efforts. Jackson filed a retaliatory restraining order after recusal, showing her animus continued even after she was no longer assigned to the case. She publicly disparaged Gerlach in sworn filings, falsely accusing her of fabricating victimhood. She used intimidation tactics, such as stationing officers in the courtroom and serving Gerlach with the same restraining order seven times, including while she was in jail to influence proceedings and manipulate Gerlach's treatment while in custody. Jackson even swore that Gerlach sent packages to judges' homes—an unsupported and defamatory claim. Together, these acts constitute harassment and demonstrate clear prejudice.

Rule 2.6 – Ensuring the Right to Be Heard

Judge Jackson violated Gerlach's right to be heard in multiple ways. She denied hearings on substantive motions, discarding evidence without consideration. Victim evidence—including police reports, victim rights forms, district attorney charging worksheets, and abuse documentation—was thrown out without review, and Gerlach was later accused by Jackson in her public restraining order filing of "pretending" to be a victim. Jackson summarily denied dozens of motions with one-word rulings, depriving Gerlach of any meaningful opportunity for review. Her failure to allow Gerlach to speak, present evidence, or receive statutory hearings denied basic due process protections and reflected deliberate suppression of critical issues.

Furthermore, at the UCCJEA Conference—which Judge Charlene Jackson relied upon to assert jurisdiction over the case—Jackson denied the parties their fundamental due process rights. She refused to allow participation or the submission of evidence either before or during the proceeding. Her ruling consisted of a single sentence, devoid of factual findings, and was issued through a non-appealable minute entry, blocking Gerlach's ability to appeal the improper ruling.

Most egregiously, Judge Jackson removed the child from the protection of an out-of-state restraining order without reviewing the order, hearing testimony, or

considering any evidence. This action was taken unilaterally and without affording the parties notice or an opportunity to be heard—both of which are foundational requirements of due process under the Fourteenth Amendment and the UCCJEA itself.

By asserting jurisdiction and issuing substantive orders without procedural fairness, Jackson not only violated statutory mandates but also undermined the legitimacy of the proceeding and the constitutional rights of the parties involved.

Rule 2.9 – Ex Parte Communications

Jackson engaged in improper ex parte communications. She coordinated privately with law enforcement, including the employer of Gerlach's opposing party, while still presiding over the custody matter. She directed security staff to monitor Gerlach's online activity and speech, none of which was disclosed on the record. She also collected material during her tenure—later cited in her personal restraining order—without giving Gerlach an opportunity to respond. These actions undermined fairness and tainted her rulings by incorporating undisclosed external influences.

Rule 2.10 – Judicial Statements on Pending Cases

In her restraining order filing, Jackson made sworn statements about Gerlach that constituted impermissible public commentary on pending proceedings. She characterized Gerlach's lawful complaints, advocacy, and filings as harassment. She accused Gerlach of fabricating domestic violence victimhood, despite refusing to review the evidence while presiding. These statements were made while identifying herself as a judge, intentionally influencing public perception and potentially prejudicing successor judges and prosecutors. Such commentary directly violated the prohibition against judicial officers speaking publicly about active or impending cases.

Rule 2.11 – Disqualification for Bias or Conflict of Interest

Jackson failed to recuse herself despite clear personal bias. She admitted later in her restraining order that she felt harassed for over a year while still ruling on Gerlach's case, confirming her impartiality was compromised. Her restraining order relied on incidents that occurred during her judicial tenure, showing that she harbored bias at the time. She also coordinated surveillance with a law enforcement agency tied to Gerlach's opposing party and participate in the criminal custodial interference investigation against Gerlach, further compounding

her conflict of interest. Jackson's failure to disclose these conflicts and step aside undermined every ruling she issued under those conditions.

Rule 3.10 – Practice of Law

While serving as a Superior Court judge, Jackson also acted as an attorney for the Hualapai Tribe. Practicing law while on the bench is prohibited under Rule 3.10 and represents a serious breach of judicial ethics. This dual role created conflicts of interest and diverted her attention from her duties as a judicial officer.

A.R.S. § 13–2407 – Tampering with Public Records

Judge Charlene Jackson is alleged to have tampered with public records by muting or erasing portions of courtroom audio during key proceedings, thereby violating litigants'—including Erin Gerlach's—constitutional right to a complete and accurate record and obstructing their ability to pursue appellate review. She deliberately placed her jurisdictional ruling into non-appealable minute entry to block oversight. Multiple litigants reported that she altered or backdated minute entries without notice, retroactively justifying her rulings or concealing misconduct. She also omitted past legal work from her application for judicial appointment, which are public records, constituting false entries. In her

restraining order, she submitted false and misleading statements that became official records, further corrupting the public record.

A.R.S. § 13–2409 – Obstructing Criminal Investigations or Proceedings

Jackson obstructed justice by ignoring credible reports of domestic violence and child abuse, refusing to act on evidence that should have prompted protection. Jackson and Gerlach's opposing counsel claimed that Gerlach participating in criminal investigations against her abuser was considered "harassment" because he is a police officer, dissuading Gerlach from participating in investigations. Jackson filed false statements in her restraining order and made false statements to law enforcement damaging Gerlach's custodial interference case. By retaliating against Gerlach through legal actions, she intimidated a witness and obstructed her ability to participate in child custody proceedings. Jackson's coordination of unlawful surveillance disrupted proper investigatory channels and impeded justice. Jackson publicly accusing Gerlach of sending packages to judges' homes has eliminated any chance the real sender will be prosecuted.

A.R.S. § 13–2703 – False Swearing / Perjury

Jackson committed false swearing by claiming under oath that she had issued only one warrant, despite records showing multiple. She retroactively

mischaracterized Gerlach's public social media post as an ex parte communication, inconsistent with her actions at the time. She omitted material legal roles, including tribal attorney work, on her judicial application, despite signing under penalty of perjury. In her restraining order, she made knowingly false statements accusing Gerlach of harassment and misconduct, which were contradicted by records. She also falsely named other judges and oversight bodies as victims in her personal filings, implicating them without basis. Jackson also made false statements to judicial officers, investigators and prosecutors in Gerlach's criminal custodial interference case who relied on Jackson's false statements, damaging their credibility.

A.R.S. § 13–2810 – Interference with Judicial Proceedings

Jackson repeatedly interfered with judicial proceedings, and it appears she is still interfering present day. She proceeded with hearings after a valid Notice of Appeal was filed, openly admitting that she placed her jurisdictional ruling in a non-appealable format to block Gerlach's ability to challenge the bogus order. She conducted a sham UCCJEA conference with no due process or statutory findings, then stripped protections from a child under a valid out-of-state restraining order. She issued retaliatory orders, sanctions and warrants following Gerlach's complaints and appeals. She allowed enforcement actions despite knowing Gerlach

had not been properly served. Jackson approved a fraudulent affidavit containing perjury as the basis for issuing a warrant, ignoring over a dozen motions filed by Gerlach with substantial evidence pointing out the deception. She coordinated surveillance of Gerlach while still presiding, acting simultaneously as judge and complainant. Her false restraining order influenced prosecutors, who cited it in open court to justify suggesting stricter bond conditions, further interfering with Gerlach's case and her right to fair proceedings. Finally, she served Gerlach seven times—including at 2 different court appearances over a month apart, in jail in California and in Jail in Arizona after extradition — with the same order, using service as a weapon of intimidation, to influence her treatment while incarcerated and to influence judicial officers.

A.R.S. § 38–504(C) – Misuse of Public Funds / Resources

Jackson misused taxpayer-funded resources by directing court security and law enforcement to surveil Gerlach's lawful advocacy. She issued retaliatory warrants and orders that consumed law enforcement resources without legitimate purpose. She conducted sham hearings without notice, wasting judicial resources. She manipulated court audio and records using publicly funded systems to conceal misconduct. She filed a personal restraining order while using court clerks and systems, misappropriating public resources for a personal vendetta. Jackson even

named other judges in her filing to lend credibility, which will divert public resources to defend her false claims. She had Gerlach served seven times, consuming resources and intimidating her. She also directed court employees to monitor Gerlach's activities, diverting their time from legitimate duties. And her involvement in Gerlach's custodial interference case — that is based on fraudulent court orders — has cost taxpayers at least a million dollars thus far.

Administrative Code (ACJA) Violations

- **ACJA § 1–302 – Judicial Employees' Code of Conduct:** Court staff were misused to surveil Gerlach's advocacy, violating the requirement that employees act with impartiality.
- **ACJA § 1–303 – Court Security Standards:** Security resources were deployed not for genuine threats, but to monitor and intimidate a litigant for protected speech.
- **ACJA § 1–401 – Financial Administration:** Taxpayer funds were spent unlawfully on surveillance and retaliatory actions unrelated to judicial duties.
- **ACJA § 1–308 – Judicial Officers and Employees:** Coordinated surveillance and concealed bias proving institutional corruption, eroding the integrity of the judiciary.

VI. Notice of Waste of Taxpayer Resources and Misuse of Public Funds

Introduction

This notice sets forth how the State of Arizona, its judiciary, and prosecutorial arms have engaged in the malicious and retaliatory prosecution of **Erin Gerlach**, expending **millions of taxpayer dollars** on proceedings rooted in **void custody orders** issued by a biased and conflicted judge. Rather than protecting children, families, or the public, Arizona has misdirected public resources into perpetuating a personal vendetta on behalf of a police officer with a history of misconduct, a judicial officer with a history of misconduct and their allies.

The prosecution of Gerlach rests on custody orders issued by **Judge Charlene Jackson**, whose misconduct includes concealed bias, tampering with court records, fraud upon the court, collusion with law enforcement, and violations of the Arizona Code of Judicial Conduct. Because orders tainted by undisclosed bias, conflicts of interest, constitutional deprivations, and fraud are **void ab initio**, the entire criminal prosecution lacks a lawful foundation.

Despite repeated complaints, notices of claim, recall petitions, and public warnings over the last 2.5 years, Arizona officials failed to intervene. Their inaction allowed this matter to escalate into a costly spectacle that undermines

public trust, diverts law enforcement resources from legitimate threats, and weaponizes the courts against a protective mother.

I. Background and Judicial Misconduct

1. Jurisdictional Defects Under the UCCJEA

a. Judge Jackson convened a sham 15-minute UCCJEA conference with only hours' notice, denying Gerlach the opportunity to be heard.

b. She issued a one-sentence jurisdictional ruling in a **non-appealable minute entry**—a deliberate circumvention of Appellate review and failed to place specific findings on the record as the statute mandates under A.R.S. § 25-1037(B).

c. Jackson later admitted on the record that she **intentionally placed the ruling in non-appealable format**, and when Gerlach obtained the For the Record (FTR) audio, that portion was muted.

d. Orders issued without jurisdiction are **void ab initio**.

2. Concealed Bias and Conflict of Interest

e. In her March 2025 restraining order, Jackson admitted she felt "harassed" by Gerlach for over a year while still presiding over her custody case.

f. She secretly coordinated with law enforcement and court security to monitor Gerlach's protected speech while presiding over the custody case.

g. She participated in investigations involving Gerlach while simultaneously issuing custody orders, warrants, and sanctions. These investigations were led by the employer of Gerlach's opposing party despite their lack of jurisdiction over Jackson's home, Gerlach's home or the courthouse.

h. **Case law:** *Tumey v. Ohio*, *In re Murchison*, and *Caperton v. Massey* establish that rulings issued under actual bias or concealed conflicts are unconstitutional and void.

3. Fraud on the Court

i. Jackson knowingly permitted Gerlach's ex-partner, law enforcement officer **Shawn Freeman**, and his attorney, **Caitlin Andrade**, to submit contradictory statements, commit perjury, and file fraudulent affidavits for warrants.

j. Jackson refused to review Gerlach's substantial evidence disproving their claims, issued summary denials of all Gerlach's motions, and allowed fraudulent affidavits to stand as the basis for warrants and custody orders that under the law Arizona had a duty to vacate.

k. Fraud upon the court vitiates every ruling it touches; such orders cannot form the foundation of valid criminal charges.

II. Misuse of Public Resources

The State of Arizona has poured taxpayer funds into enforcing, defending, and prosecuting cases based on orders that were legally nullities.

1. Extra jurisdictional Law Enforcement Costs

a. Arizona law enforcement traveled to California multiple times to surveil, harass, and ultimately extradite Gerlach.

b. These trips consumed tens of thousands of dollars in taxpayer-funded travel, overtime, and coordination.

c. Officers engaged in **cross-state surveillance** of Gerlach and a SWAT raid—despite the underlying custody orders being void.

2. Jail and Extradition Expenses

d. Gerlach was jailed in California, held in custody, and extradited to Arizona at significant cost to taxpayers.
e. Arizona assumed expenses for transport, housing, and detention, all to enforce unlawful orders.

3. Misallocation of Investigative Resources

f. Freeman's "kidnapping" allegations—made while he vacationed in Hawaii, Mexico, Idaho, Colorado, and California, designing and building a new home and getting engaged—were treated as legitimate emergencies.
g. Multiple **homicide detectives** were diverted to his case, despite no credible evidence of danger.
h. Meanwhile, Arizona citizens demanded more funding for school resource officers and unsolved child homicide investigations.

4. Prosecution Costs

i. Arizona has already likely spent **over $1 million** prosecuting Gerlach—covering detectives, prosecutors, hearings, court staff, detention, investigations and judicial time.

j. This figure will only rise with ongoing trials, appeals, and potential civil litigation resulting from Jackson's misconduct.

5. Weaponization of Court Security and Public Resources

k. Jackson directed taxpayer-funded court staff and law enforcement to monitor Gerlach's social media, advocacy, and records requests despite being covered under the First Amendment.

l. She filed a personal restraining order but used her judicial title, court clerks, and law enforcement to serve it—diverting public resources for a private vendetta.

m. This conduct constitutes misuse of funds under **A.R.S. § 38-504(C)** and administrative code provisions prohibiting personal use of public resources.

III. Why the Custody Orders Are Void

The custody orders forming the foundation of this prosecution are void because they were:

- Issued **without jurisdiction** under the UCCJEA.
- Entered by a judge with **concealed bias and conflict of interest**.

- Secured through **fraud upon the court** and perjury by Freeman and his attorney.
- Tainted by **record tampering** and denial of due process.
- Used to deprive Gerlach and her child of **constitutional rights** including free speech, equal protection, due process, familial association, and a fair tribunal.

Under binding case law, such orders are not enforceable. Arizona cannot lawfully expend taxpayer dollars prosecuting alleged violations of void and unconstitutional orders.

IV. Deprivation of Constitutional Rights

The actions of Judge Charlene Jackson in connection with the Gerlach matter constitute a systemic deprivation of constitutional rights. Her rulings and conduct, tainted by undisclosed bias, retaliation, and procedural irregularities, violated guarantees under both the **United States Constitution** and the **Arizona Constitution**. As a matter of law, such violations render judicial orders void and unenforceable.

1. Denial of Due Process and Appellate Review

Judge Jackson intentionally manipulated the appellate record by placing jurisdictional determinations in non-appealable minute entries, and by muting portions of the For the Record (FTR) audio,

including statements in which she admitted this deliberate tactic. Such conduct deprived Gerlach of meaningful access to appellate review, in violation of the **Due Process Clause of the Fourteenth Amendment to the U.S. Constitution** and **Article 2, Section 11 of the Arizona Constitution**, which guarantees that justice shall be administered openly and without denial.

2. **Retaliation for Constitutionally Protected Speech and Oversight**

   In her March 2025 restraining order, Judge Jackson explicitly identified Gerlach's judicial complaints, public records requests, and oversight activities as "harassment." This demonstrates that Jackson retaliated against Gerlach for engaging in activities protected by the **First Amendment to the U.S. Constitution** and **Article 2, Section 6 of the Arizona Constitution**, which secure the rights to free speech, petition, and public criticism of government officials. By weaponizing judicial authority against protected activity, Jackson chilled Gerlach's lawful exercise of constitutional rights.

3. **Conflict of Interest and Denial of an Impartial Tribunal**

   While actively presiding over Gerlach's custody matter, Judge Jackson coordinated with law enforcement connected to Gerlach's opposing party, participated in surveillance efforts against her, and

concealed her personal view that Gerlach's filings and complaints constituted harassment. The **Due Process Clause of the Fourteenth Amendment** and **Article 2, Section 23 of the Arizona Constitution** guarantee litigants a fair and impartial tribunal. As established in *In re Murchison*, 349 U.S. 133 (1955), and *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009), judicial bias or the appearance thereof vitiates due process. Jackson's undisclosed conflict of interest and concealed animus therefore rendered her orders void ab initio.

4. **Violation of Substantive Due Process Rights Relating to Family Integrity and Child Safety**

Jackson's disregard for evidence of domestic violence and child abuse, and her decisions placing Gerlach's child in unsafe conditions, violated substantive due process protections afforded under the **Fourteenth Amendment** and **Article 2, Section 8 of the Arizona Constitution**, which recognizes the sanctity of family and home. Especially when Gerlach's opposing party admitted he committed domestic violence in his pleadings claiming that Gerlach allowed their child to witness significant domestic violence committed by Father against Mother. Jackson removed the child from her only caretaker and placed her with their abuser. The U.S. Supreme Court

has affirmed these protections in *Troxel v. Granville*, 530 U.S. 57 (2000), recognizing a parent's fundamental right to the care, custody, and control of their child. Jackson's actions represent a clear violation of these constitutional protections.

5. **Retaliatory Warrants and Sanctions**

   Judge Jackson issued warrants and sanctions against Gerlach in close temporal proximity to Gerlach's filing of judicial complaints and appeals, conduct that constitutes unlawful retaliation. Retaliatory judicial action undermines neutrality and equal application of the law, in contravention of the **Equal Protection Clause of the Fourteenth Amendment** and **Article 2, Section 13 of the Arizona Constitution**, which prohibit discriminatory treatment and guarantee equal privileges and immunities under the law.

Judge Jackson's conduct reflects a pattern of systemic constitutional violations, including denial of due process, infringement of First Amendment rights, deprivation of an impartial tribunal, interference with family integrity, and retaliatory judicial action. Orders issued under such conditions are not merely erroneous but are constitutionally infirm and **void as a matter of law**. The

continuation of enforcement actions based upon these defective orders compounds the violations, undermines public confidence in the judiciary, and imposes unlawful burdens on both the litigant and the taxpayers of Arizona.

V. Systemic Failure by Arizona Officials

Arizona had multiple opportunities to intervene:

- **Judicial complaints** filed against Jackson.
- **Notice of Claim** outlining her misconduct.
- **Recall petitions** highlighting her abuse of authority.
- Public records documenting **perjury, fraud, and collusion**.

Yet officials failed to act. This abdication allowed Jackson's misconduct to metastasize into a criminal prosecution that now drains millions of taxpayer dollars on a personal vendetta while eroding public confidence in law enforcement and the judiciary.

VI. Conclusion

This prosecution represents not only a personal vendetta but a systemic failure. Arizona's taxpayers are funding:

- Travel across state lines for unnecessary surveillance, service of warrants and SWAT raids.
- Extradition and jailing of a protective mother based on void orders.
- Deployment of homicide detectives and dozens of other law enforcement personnel to pursue fabricated allegations.
- Judicial misuse of public resources for private retaliation.
- Protection of a certified police officer with a history of misconduct who committed perjury, perjury by inconsistent statements and fraud on the court to obtain custody of a child who he abused.
- Protection of a Judge who is committing misconduct and ultimately using taxpayer dollars to retaliate against a parent who exposed her misconduct.

This case has already cost over a million dollars, with no benefit to the public. Instead, it undermines public safety, diverts resources from real victims, places a child in danger, punishes a protective parent, and perpetuates corruption.

Investigation into the misuse of funds and the clear conflicts of interest, bias, and collusion of all involved in Gerlach's prosecution to restore integrity to Arizona's courts and protect taxpayers from further abuse. Taxpayer funds should

not be used as personal security, to fuel personal vendettas or to retaliate against whistleblowers who expose official corruption.